



August 7, 2013
Federal Communications Commission

445 12th Street, S.W.
Washington, D.C. 20554

Re: *In the Matter of Accessibility of User Interfaces, and Video
Programming Guides and Menus, MB Docket No. 12-108, Notice of
Proposed Rulemaking (FCC 13-77)*

Dear Commissioners:

Raynham Community Access & Media Inc. submits this letter in the above-referenced rulemaking proceeding (NPRM) in support of the comments filed by the Alliance for Community Media; the Alliance for Communications Democracy; Montgomery County, Maryland; and the National Association of Counties, National Association of Telecommunications Officers and Advisors & U.S. Conference of Mayors.

Raynham Community Access & Media Inc. is a nonprofit community media center in Raynham, MA. We currently operate two television channels and carry all local government meets, sports, school events and more. Our programming is available to close to 15,000 subscribers in Raynham, MA and many more online.

We have program descriptions and accessibility information readily available for our programs with accessibility options such as closed captions. However, currently, Comcast only shows our programs in the program guide as "local programming". This level of information is inadequate to meet the accessibility goals of the Twenty-First Century Communications and Video Accessibility Act of 2010 (CVAA). Viewers cannot determine from the MVPD's video programming guide what our programs are and whether our programs are accessible. Thus, viewers with visual or auditory disabilities cannot make meaningful video program choices.

We urge the Commission to adopt rules that would require video programming

guides and menus which display channel and program information to include, for all channels, high level channel and program descriptions and titles, as well as a symbol identifying the programs with accessibility options (captioning and video description).

Thank you for the opportunity to submit these comments.

Michael Heylin

Executive Director

Raynham Community Access & Media Inc.